

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

EDWARD L. GILMORE,

Plaintiff,

v.

Civil Action No. 1:13-cv-789 (LO/IDD)

ERIC HOLDER,

In his official capacity as
Attorney General of the United States,

Defendant.

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PRE-DISCOVERY
SCHEDULING**

WHEREAS, Edward L. Gilmore (“Plaintiff”) commenced the above-captioned action against Eric Holder in his official capacity as Attorney General of the United States (“Defendant,” and together with Plaintiff, “the Parties”) on June 26, 2013;

WHEREAS the Parties, by and through their counsel, met and conferred on August 26, 2013 to discuss scheduling of pre-discovery matters;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:

1. Defendant shall respond to Plaintiff's complaint no later than September 27, 2013.
2. Should Defendant respond to the complaint by filing a motion pursuant to Rule 12 of the Federal Rules of Civil Procedure ("Motion"), the following schedule shall apply to briefing relating to the Motion:
 - a. Plaintiff's Opposition to the Motion will be due October 18, 2013;
 - b. Defendant's Reply to Plaintiff's Opposition to the Motion will be due November 1, 2013.

Dated: September 3, 2013

For the Plaintiff:

/s/
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For the Defendant:

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Attorneys for Defendant Eric Holder

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: _____, 2013

By: _____

The Honorable Liam O'Grady
United States District Judge